

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

DECLARATION OF SETH A. GOLDBERG

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”, and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Motion for Protective Order to Preclude the Deposition of ZHP President Baohua Chen.

3. Attached to this Declaration as **Exhibit A** is a table illustrating some references to Baohua Chen during the depositions of the ZHP Parties witnesses.

4. Attached to this Declaration as **Exhibit B** is a table illustrating the references to Baohua Chen in the exhibits introduced at the depositions of the ZHP Parties witnesses.

5. A true and correct copy of the final transcript of Eric Gu’s deposition testimony on April 5, 2021 is attached to this Declaration as **Exhibit C**.

6. A true and correct copy of the final transcript of Hai Wang's deposition testimony on March 10, 2021 and March 11, 2021 is attached to this Declaration as **Exhibit D**.

7. A true and correct copy of the final transcript of Minli Zhang's deposition testimony on March 22, 2021, March 23, 2021, and March 24, 2021 attached to this Declaration as **Exhibit E**.

8. A true and correct copy of the final transcript of Peng Dong's deposition testimony on March 29, 2021, March 30, 2021, and March 31, 2021 is attached to this Declaration as **Exhibit F**.

9. A true and correct copy of the final transcript of Qiangming Li's deposition testimony on April 13, 2021, April 15, 2021, and April 16, 2021 is attached to this Declaration as **Exhibit G**.

10. A true and correct copy of the final transcript of Min Li's deposition testimony on April 20, 2021 and April 22, 2021 is attached to this Declaration as **Exhibit H**.

11. A true and correct copy of the final transcript of Jucai Ge's deposition testimony on April 27, 2021, April 28, 2021, April 29, 2021, and April 30, 2021, is attached to this Declaration as **Exhibit I**.

12. A true and correct copy of a declaration executed by Linhong (Linda) Lin, the Director of Regulatory Affairs of ZHP, is attached to this Declaration as **Exhibit J**.

13. A true and correct copy of the final transcript of Linda Lin's deposition testimony on May 4, 2021 and May 5, 2021 is attached to this Declaration as **Exhibit K**.

14. A true and correct copy of the final transcript of Lijie Wang's deposition testimony on January 26, 2021 is attached to this Declaration as **Exhibit L**.

15. A true and correct copy of an English language translation of an e-mail dated July 27, 2017, authored by ZHP employee Jinsheng Lin (ZHP00190573) is attached to this Declaration as **Exhibit M**.

16. A true and correct copy of an organizational chart of the ZHP Parties' executives (ZHP00076708) is attached to this Declaration as **Exhibit N**.

17. A true and correct copy of the final transcript of Eric Tsai's deposition testimony on April 8, 2021 is attached to this Declaration as **Exhibit O**.

18. A true and correct copy of the opening meeting attendants for the June 5, 2017 FDA inspection (ZHP00005780) is attached to this Declaration as **Exhibit P**.

19. A true and correct copy of the FDA's Establishment Inspection Report of ZHP's premises that occurred in January 2018 (PRINSTON00081570) is attached to this Declaration as **Exhibit Q**.

20. A true and correct copy of the FDA's Establishment Inspection Report of ZHP's premises that occurred in August 2013 (PRINSTON00082994) is attached to this Declaration as **Exhibit R**.

21. A true and correct copy of the FDA's Establishment Inspection Report of ZHP's premises that occurred in March 2015 (PRINSTON00083026) is attached to this Declaration as **Exhibit S**.

22. A true and correct copy of the FDA's Establishment Inspection Report of ZHP's premises that occurred in June 2019 (PRINSTON00083640) is attached to this Declaration as **Exhibit T**.

23. A true and correct copy of the FDA's Establishment Inspection Report of ZHP's premises that occurred in November 2016 (PRINSTON00081549) is attached to this Declaration as **Exhibit U**.

24. A true and correct copy of the FDA's Establishment Inspection Report of ZHP's premises that started in July 2018 (PRINSTON00162373) is attached to this Declaration as **Exhibit V**.

25. A true and correct copy of ZHP's Protocol of Valsartan API Recall (ZHP00494048) is attached to this Declaration as **Exhibit W**.

Executed on May 17, 2021.

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
*Lead Counsel and Liaison
Counsel for Defendants*

DUANE MORRIS LLP

Seth A. Goldberg, *Lead Counsel and
Liaison Counsel for Defendants*
30 South 17th Street
Philadelphia, Pennsylvania 19103
Tel.: (215) 979-1000
Fax: (215) 979-1020
SAGoldberg@duanemorris.com

*Attorneys for Zhejiang Huahai
Pharmaceutical Co, Ltd., Princeton
Pharmaceutical Inc., and Solco*